



Two Memorial City Plaza
820 Gessner, Suite 940
Houston, Texas 77024
Tel: 713.343.0478
Fax: 713.758.0146
www.hnbllc.com

February 9, 2021

VIA ECF

Rhonda Moore-Konieczny
Case Manager to Judge Gray H. Miller
United States Courthouse
515 Rusk Avenue, Room 9010C
Houston, Texas 77002
cm4141@txs.uscourts.gov

Re: *DISH Network L.L.C. v. Nauman Khalid, d/b/a Freetvall.com et al.*, No. 4:19-cv-04563

Dear Ms. Moore-Konieczny:

I represent Plaintiff DISH Network L.L.C. (“DISH”) in the above referenced action. I submit this letter seeking the Court’s entry of the attached protective order.

Good cause exists for entry of a protective order. Defendant Nauman Khalid (“Defendant”) is a resident of Faisalabad, Pakistan where he was served with DISH’s complaint in this action on April 21, 2020. (Dkt. 12 at 3 ¶¶ 4, 7.) Defendant failed to answer or respond to the complaint and is in default. DISH filed a combined motion for entry of default and default judgment on July 3, 2020. (Dkt. 15.)

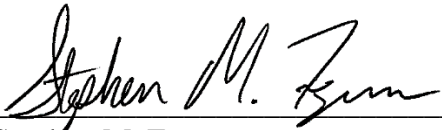
On February 4, 2021, I was contacted by the Court stating, “[I] did not include an affidavit stating whether or not the defendant is in military service as required by our procedures – please get this filed within 10 days or your motion will be stricken from the record.”

Defendant’s date of birth is required to search his military service status at the Servicemembers Civil Relief Act (“SCRA”) website. *See* <https://scra-w.dmdc.osd.mil/scra/#/single-record>. PayPal, Inc. is in possession of Defendant’s date of birth. (*See* Dkt. 15-3 at 16.) On February 4, 2021, I requested that PayPal provide Defendant’s date of birth because of the Court’s order and procedures. On February 5, 2021, PayPal responded that it “will need a court-issued protective order or order requiring the production of non-redacted information before [it] can produce such information.”

The attached protective order is used by some judges in this District. *See* <https://www.txs.uscourts.gov/sites/txs/files/GCH%20STANDING%20PROTECTIVE%20ORDER.pdf>. DISH respectfully requests that the Court enter the Protective Order.

Sincerely,

HAGAN NOLL & BOYLE LLC



Stephen M. Ferguson